

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
GREENBELT DIVISION

IN RE:  
ANNIE WORMELY JUNIUS  
Debtor

BCN#: 19-15237

Chapter: 7

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U.S. BANK NATIONAL ASSOCIATION, AS  
INDENTURE TRUSTEE, FOR CIM TRUST  
2016-4, MORTGAGE-BACKED NOTES,  
SERIES 2016-4  
and its assignees and/or  
successors in interest,  
Movant/Secured Creditor,

**MOTION FOR ORDER GRANTING RELIEF  
FROM AUTOMATIC STAY**

v.  
ANNIE WORMELY JUNIUS  
Debtor  
Respondents

COMES NOW, U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE  
TRUSTEE, FOR CIM TRUST 2016-4, MORTGAGE-BACKED NOTES, SERIES 2016-4,  
its assignees and/or successors in interest, (Movant herein), by Counsel, alleges as  
follows:

1. This Court has Jurisdiction over this proceeding pursuant to 28 U.S.C. Sections 157 and 1334 and 11 U.S.C. 362; Federal Rule of Bankruptcy Procedure 9014; and Local Bankruptcy Rule 4001-1(a), and that this matter is a core proceeding.
2. The above named Debtor(s) filed a Chapter 7 Petition in Bankruptcy with this Court on April 17, 2019.
3. The Movant is the current payee of a promissory note secured by a Deed of Trust upon a parcel of real property with the address of 5058 Blenny Court, Waldorf, MD 20603 and more particularly described in the Deed of Trust dated August 17, 2005 and recorded at Book 05422 at Page 0539, among the land records of the County of Charles, Maryland:

LOT NUMBERED FIFTY-EIGHT (58) IN THE SUBDIVISION KNOWN AS "ST. CHARLES COMMUNITIES, LANCASTER/DORCHESTER NEIGHBORHOOD/PARCEL "A", SHEET 3 OF 5", AS PER PLAT THEREOF RECORDED AMONG THE LAND RECORDS OF CHARLES COUNTY, MARYLAND IN PLAT BOOK DGB 36 AT PLAT NO. 5.

Copies of the Note and Deed of Trust are attached hereto, marked as exhibits A & B and made a part hereof by reference.

4. This Movant is informed and believes, and based upon such information and belief, alleges that title to the subject Property is currently vested in the name of the Debtor(s).

5. The Debtor intends to surrender the subject property according to the Statement of intent filed with this Court on April 17, 2019.

6. As of April 19, 2019, the estimated outstanding obligations are:

Unpaid Principal Balance	\$ 272,727.06
Unpaid, Accrued Interest	\$ 17,428.25
Uncollected Late Charges	\$ 0.00
Mortgage Insurance Premiums	\$ 0.00
Taxes and Insurance Payments on behalf of Debtor	\$ 1,510.70
Other Costs	\$ 3,565.32
Less: Partial Payments	(\$ 0.00)
Minimum Outstanding Obligations	\$ 295,231.33

7. The Debtor is in default with regard to payments which have become due under the terms of the aforementioned note and Deed of Trust.

As of April 19, 2019, the Debtor is due for:

Number of Missed Payments	From	To	Monthly Payment Amount	Total Missed Payments
5	July 1, 2018	November 1, 2018	\$2,675.57	\$13,377.85
5	December 1, 2018	April 1, 2019	\$2,670.94	\$13,354.70
Atty Fees and Costs:				\$931.00
Total Payments:				\$27,663.55

8. The Movant has elected to initiate foreclosure proceedings on the Property with respect to the subject Deed of Trust, but is prevented by the Automatic Stay from going forward with these proceedings.

9. This Movant is informed and believes, and based upon such information and belief, alleges that absent this Court's Order allowing this Movant to proceed with the pending foreclosure, Movant's security will be significantly jeopardized and/or destroyed.

10. Roger Schlossberg, has been appointed by this Court as the Chapter 7 Trustee in this instant Bankruptcy proceeding.

11. This Movant is informed and believes and, based upon such information and belief, alleges that the Debtor has little or no equity in the property.

WHEREFORE, Movant prays for an order granting relief from Automatic Stay, and for such other relief as the Court deem proper.

Dated: April 26, 2019

SHAPIRO & BROWN, LLP  
Attorneys for Movant

By: /s/ Renee Dyson

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Certificate of Service

I hereby certify that on the 26th day of April, 2019, the following person(s) were served a copy of the foregoing Motion for Order for Relief from Automatic Stay in the manner described below:

Via CM/ECF Electronic Notice:

David M. Gormley  
Andrews, Bongar, Gormley & Clagett, PA  
11705 Berry Road, Ste. 202  
Waldorf, MD 20603

Debtor's Attorney

Roger Schlossberg  
P.O. Box 2067  
Hagerstown, MD 21742

Trustee

Via First Class Mail, Postage Prepaid:

Annie Wormely Junius  
5058 Blenny Court  
Waldorf, MD 20603

Debtor

/s/ Renee Dyson  
William M. Savage, Esquire  
Kristine D. Brown, Esquire  
Thomas J. Gartner, Esquire  
Gregory N. Britto, Esquire  
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